

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREGORY MANGO,

Plaintiff,

v.

BUZZFEED, INC.,

Defendant.

Case No. 1:17-cv-06784 (VM)

**DECLARATION OF
MICHELLE MANCINO MARSH**

I, Michelle Mancino Marsh, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following information is true and correct:

1. I am a partner with the law firm Arent Fox LLP and we have on May 20, 2019 made our appearance in this action as co-counsel for Defendant BuzzFeed, Inc. (the “Defendant” or “BuzzFeed”).

2. Pursuant to the Court’s Order, dated March 11, 2019 [ECF No. 70], we respectfully submit the following Defendant’s Trial Exhibits to supplement the District Court Record.

3. Attached as Exhibit 1 is a true and correct copy of Defendant’s Trial Exhibit A.

4. Attached as Exhibit 2 is a true and correct copy of Defendant’s Trial Exhibit B.

5. Attached as Exhibit 3 is a true and correct copy of Defendant’s Trial Exhibit L.

6. Pursuant to the Stipulated Protective Order [ECF No. 29], Exhibit 2, Defendant's Trial Exhibit B, a document produced by BuzzFeed and designated "Attorneys Eyes Only," is being filed under seal.

7. Exhibit 3, Defendant's Trial Exhibit L is also being filed under seal as it is a summary document comprised of information collected from documents produced by Plaintiff which were designated "CONFIDENTIAL –Produced Subject to Protective Order."

8. Pursuant to the Court's Order, dated June 10, 2019 [ECF No. 77], attached as Exhibit 4 is a true and correct copy of Defendant's Second Offer of Judgment, dated July 27, 2018.

Executed this 11th day of June, 2019

/s/ Michelle Mancino Marsh
Michelle Mancino Marsh